

**Before the  
Public Service Commission of South Carolina**

**Docket No. 2020-4-G**

**Annual Review of Purchased Gas Adjustment and  
Gas Purchasing Policies of Piedmont Natural Gas Company, Inc.**

**Testimony & Exhibits of Jeffrey Patton**

**On Behalf Of**

**Piedmont Natural Gas Company, Inc.**



**June 2, 2020**

1 **Q. Please state your name and your business address.**

2 A. My name is Jeffrey Patton. My business address is 4720 Piedmont Row  
3 Drive, Charlotte, North Carolina.

4 **Q. By whom and in what capacity are you employed?**

5 A. I am employed by Duke Energy Corporation (“Duke”) and work on behalf of  
6 Piedmont Natural Gas Company, Inc. (“Piedmont” or the “Company”), a  
7 wholly owned subsidiary of Duke, as the Manager of Pipeline Services.

8 **Q. Please describe your educational and professional background.**

9 A. I graduated from Mississippi State University with a Bachelor of Science  
10 Degree in Mechanical Engineering in 1996, and I graduated from Auburn  
11 University in 1998 with a Master of Business Administration, Finance  
12 concentration. I was employed by Southern Company from 1998 to 2003 in  
13 various roles in Generation Planning and Development, as well as Energy  
14 Marketing. I was employed by Consolidated Edison from 2004 to 2005 as a  
15 Senior Rate Analyst. I served as a Senior Business Financial Analyst at  
16 Progress Energy from 2005 to mid-2008 and was responsible for wholesale  
17 electric revenue forecasting. From mid-2008 to early 2019, I was an  
18 Originator in the Fuels & Systems Optimization Department for Progress  
19 Energy (which merged with Duke), and I was responsible for the procurement  
20 of natural gas supply, transportation and storage services for Duke’s natural  
21 gas-fired power generation facilities. In February 2019 I accepted my current  
22 position as Manager of Pipeline Services.

23 **Q. Please describe the scope of your present responsibilities.**

1 A. My current major responsibilities include the supervision of pipeline capacity  
2 planning and relations, annual design day and daily forecasting for Piedmont  
3 and Duke's Midwest LDCs. In addition, I am responsible for oversight of  
4 Duke's Midwest LDCs' and Piedmont's activities at the Federal Energy  
5 Regulatory Commission ("FERC") regarding interstate pipelines that the  
6 Company utilizes for transportation and storage services.

7 **Q. Have you previously testified before this Commission or any other**  
8 **regulatory authority?**

9 A. I have not previously testified before this Commission. In 2014 I testified  
10 before the Florida Public Service Commission in support of Duke Energy  
11 Florida, LLC's Petition for Determination of Need for the Citrus County  
12 Combined Cycle Power Plant in Docket 20140110.

13 **Q. What is the purpose of your testimony in this proceeding?**

14 A. The purpose of my testimony is to discuss the market requirements of  
15 Piedmont's South Carolina customers, including the projected growth in  
16 those markets, the capacity acquisition policies and practices we employ to  
17 serve those markets, and the efforts undertaken by Piedmont at the FERC on  
18 behalf of its customers to ensure that interstate transportation and storage  
19 services are reasonably priced.

20 **Q. What is the Review Period in this docket?**

21 A. The Review Period is April 1, 2019 through March 31, 2020.

22 **Q. Please give a general description of Piedmont and its market in South**  
23 **Carolina.**

1 A. Piedmont is a local distribution company principally engaged in the purchase,  
2 distribution and sale of natural gas to more than 1 million customers in South  
3 Carolina, North Carolina, and the metropolitan area of Nashville, Tennessee.  
4 Piedmont serves approximately 151,812 customers in the State of South  
5 Carolina. During the Review Period, Piedmont delivered 65,188,728  
6 dekatherms (“dts”) of natural gas to its South Carolina customers.

7 Piedmont provides regulated natural gas service to two distinct  
8 markets – the firm market (principally residential, small commercial and  
9 small industrial customers) and the interruptible market (principally large  
10 commercial and industrial customers). Although Piedmont competes with  
11 electricity for the attachment of firm customers, once attached these  
12 customers generally have no readily available alternative source of energy  
13 and depend on natural gas for their basic space heating or utility needs.  
14 During the Review Period, 65,476,084 dts, or approximately 93%, of  
15 Piedmont’s South Carolina deliveries were to the firm market.

16 In the interruptible market, Piedmont competes on a month-to-  
17 month and day-to-day basis with alternative sources of energy, primarily fuel  
18 oil or propane and, to a lesser extent, coal or wood. These larger commercial  
19 and industrial customers will buy alternate fuels when they are less expensive  
20 than natural gas. During the Review Period, 4,501,090 dts, or approximately  
21 7% of Piedmont’s South Carolina deliveries were to the interruptible market.

22 **Q. How does Piedmont calculate its customer growth?**



1 A. Piedmont reviews historical customer additions, holds discussions with  
2 various business leaders/trade allies and field sales employees, and considers  
3 forecasts of local, regional and national business drivers (i.e., economic  
4 conditions, demographics, etc.) to derive its customer growth projections.

5 **Q. How did the Company calculate its Design Day requirements for Winter**  
6 **2019 - 2020?**

7 A. Piedmont's Design Day calculations for Winter 2019 - 2020 were performed  
8 using the same methodology as described in last year's Annual Review  
9 proceeding. Specifically, all of the usage data was refreshed utilizing the  
10 actual customer sendout data from November 2014 through March 2019  
11 which included the most current winter weather experience for all customer  
12 classes. Second, linear regression analyses were conducted to determine the  
13 base load and the usage per heating degree day based on all of the newly  
14 refreshed data. Finally, the historical weather data, including the winter 2018  
15 – 2019 data, was reviewed to determine that the Design Day temperature  
16 should be slightly adjusted from 8.68 to 8.71 degrees Fahrenheit. The  
17 Company also constructed a load duration curve to forecast the Company's  
18 firm sales market requirements for design winter weather conditions. The  
19 supply requirements were plotted in descending order of magnitude, with  
20 existing pipeline capacity and storage resources overlaid to expose any supply  
21 shortfalls. The load duration curves for the 2019 - 2020 **forecasted** design  
22 winter season, as well as the **actual** 2019 - 2020 winter season are shown in

1       **Exhibits\_\_ (JCP-1A and JCP-1B).** The load duration curve for the 2020 -  
2       2021 forecasted design winter season is shown in **Exhibit\_\_ (JCP-2).**

3       **Q. Has the Company made any changes to its calculation of Design Day**  
4       **requirements for the future?**

5       **A.** No. The Company is utilizing the same methodology as described above,  
6       refreshed to include actual customer sendout data from Winter 2019 - 2020  
7       for the calculation of the Design Day requirement to be effective with this  
8       coming winter – Winter 2020 - 2021.

9       **Q. Please provide a walkthrough of the Design Day demand calculation.**

10      **A.** The “System Design Day Firm Send Out” (line 1, **Exhibit\_\_ (JCP-4C)** is  
11      calculated by: 1) multiplying the number of heating degree days (“HDD”) in  
12      the Design Day by the usage per HDD as calculated in the regression analysis.  
13      This is then added to the base load number.<sup>1</sup> This number is then increased  
14      each successive year to take into account the forecasted net growth rate. 2)  
15      Any mid-year special firm sales pick up is added (line 2) and any mid-year  
16      movements from firm sales to firm transportation are subtracted (line 3). This  
17      creates a total System Design Day Sendout with net mid-year adjustments  
18      (line 4). 3) Any special contract firm sales commitment (line 5) is added to  
19      come up with the “Total Firm Design Day Demand” (line 6). 4) A five (5)  
20      percent reserve margin is then calculated (line 7) and is added to the “Total  
21      Firm Design Day Demand” (line 4) to come up with the “Subtotal Demand”  
22      (line 8). 5) The “Firm Transportation without Standby” (line 10) is

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<sup>1</sup> Formula: (Design Day HDDs x Usage per HDD)+Base Load = System Design Day Firm Sendout

1 represented as the total dekatherms consumed by all industrial firm  
2 transportation customers on the highest winter day usage for that customer  
3 class for the prior winter. This number is then subtracted from the “Subtotal  
4 Demand” resulting in the “Total Firm Sales Demand” (line 11) for that year.  
5 Each subsequent yearly Design Day forecast is derived by increasing the firm  
6 sales rate classes’ usage by multiplying the previous year’s projected usage  
7 times each succeeding year’s forecasted growth percentage.

8 **Q. What process does Piedmont undertake to acquire firm capacity to meet**  
9 **its growing sales market requirements?**

10 A. Piedmont secures incremental capacity to meet the growth requirements of its  
11 firm sales customers consistent with its “best cost” policy, as described in the  
12 testimony of Company Witness Todd Breece. To implement this policy,  
13 Piedmont attempts to contract for timely and cost-effective capacity that is  
14 tailored to the demand characteristics of its market. Piedmont evaluates  
15 interstate pipeline capacity and storage offerings expected to be available at  
16 the time that it is determined that additional future firm delivery service is  
17 required or prior to the expiration of existing firm delivery service contracts.  
18 The Company attempts to match the days of service of new incremental  
19 transportation capacity to the duration of its incremental demand on the most  
20 economical basis possible. Piedmont attempts to acquire peaking services to  
21 meet projected peak day demand, storage services to meet projected seasonal  
22 demand, and year-round firm transportation services to meet base load  
23 demand and in order to provide available capacity for storage inventory

1 replenishment. However, service choices are limited to those offered during  
2 the period being evaluated.

3 **Q. Does Piedmont believe that conservation measures utilized by customers**  
4 **are applicable when formulating Design Day calculations?**

5 A. Based on observable customer usage patterns, Piedmont believes  
6 conservation measures are generally being utilized by our customers, but  
7 Piedmont has not seen evidence that conservation/reduced usage is occurring  
8 during Design Day conditions or during extended cold weather snaps in  
9 winter. For example, during the winter of 2017-2018, a particularly cold  
10 weather event occurred which gave Piedmont an opportunity to refresh data  
11 and analyze our customers' behavior during extremely cold weather. As in  
12 the past, we continued to observe that customers tend to conserve for the first  
13 few days of colder temperatures before turning up the thermostat. However,  
14 once adjusted to a warmer setting, customers appear to become less focused  
15 on conservation and more focused on comfort and leave the thermostat at the  
16 warmer level for a few days even as temperatures start to moderate. This  
17 pattern is illustrated in **Exhibit\_\_ (JCP-3)**. Given what Piedmont  
18 experienced in the winter of 2017 - 2018 as a customer response to colder  
19 temperatures in this pattern, the Company is confident this conservative  
20 approach to Design Day forecasting is the most prudent approach. Our focus  
21 has been and continues to be to reliably serve our firm customers on a Design  
22 Day.

1 **Q. What were the Design Day demand requirements used by the Company**  
2 **for planning purposes during the Review Period, the amount of heating**  
3 **degree days, dekatherms per heating degree day, customer growth rates**  
4 **and supporting calculations used to determine the Design Day**  
5 **requirement amounts?**

6 A. Please see Exhibits\_\_ (JCP-4A, 4B and 4C).

7 **Q. What are the forecasted Design Day demand requirements used by the**  
8 **Company for planning purposes for the upcoming Winter 2020 - 2021**  
9 **and for the next four winter seasons, the amount of heating degree days,**  
10 **dekatherms per heating degree day, customer growth rates and**  
11 **supporting calculations used to determine the Design Day requirement**  
12 **amounts?**

13 A. Please see Exhibits\_\_ (JCP-5A, 5B, and 5C).

14 **Q. What were the estimated base load demand requirements of the firm**  
15 **market for the Review Period?**

16 A. Please see Exhibit\_\_ (JCP-4A).

17 **Q. What are the upcoming Winter 2020 - 2021 forecasted base load demand**  
18 **requirements for the next four years?**

19 A. Please see Exhibit\_\_ (JCP-5A).

20 **Q. Please describe how the Company plans to supply its estimated future**  
21 **growth requirements during the next four-year period beginning with**  
22 **the 2020 - 2021 winter season.**

23 A. Based on current forecasted projections, Piedmont believes that it has

1 sufficient supply and capacity rights to meet its customer needs for the 2020  
2 – 2021 winter season. The most recent projects of Transco’s Leidy Southeast  
3 expansion for 100,000 dts per day of year-round capacity and Transco’s  
4 Virginia Southside expansion for 20,000 dts per day went into service in late  
5 2015 and early 2016. Additionally, Piedmont has increased the Design Day  
6 output of its Bentonville liquefied natural gas (“LNG”) peaking facility from  
7 90,000 dts per day to 110,000 dts per day beginning in the 2020 – 2021 winter  
8 season. This 20,000 dts per day increase is a result of a combination of  
9 customer load growth in eastern North Carolina and system pipeline upgrades  
10 including the Pipeline 439 upgrade near Greenville, NC that went into service  
11 in early 2020. Together, the load growth along with the system piping  
12 upgrades, allow for increased take away volume to be utilized on a Design  
13 Day at the Bentonville LNG facility. Piedmont plans to supply its estimated  
14 future growth requirements for the 2021-2022 through 2024-2025 winter  
15 seasons through the addition of a LNG facility in Robeson County, NC  
16 (“Robeson LNG”) and the in-service of the Atlantic Coast Pipeline (“ACP”).  
17 Piedmont is currently constructing the Robeson LNG facility, and it is  
18 anticipated to be completed in the summer of 2021. The Robeson LNG  
19 facility is forecasted to provide 200,000 dts per day of peaking supply of  
20 natural gas during peak usage days starting in the 2021-2022 winter season.  
21 In 2014, the Company entered into a Precedent Agreement with ACP to add  
22 160,000 dts per day of additional capacity utilizing its “best cost” purchasing  
23 philosophy. The ACP capacity is scheduled to go into service in the first half

1 of 2022. The capacity portfolio for the 2021-2022 winter season and beyond  
2 will be restructured to include Robeson LNG using the “best cost” gas  
3 purchasing policy while taking into account the customer load profile. The  
4 removal of identified capacity contracts beginning with the 2021 - 2022  
5 winter season as detailed in **Exhibit\_\_\_ (JCP-5C)** represents an illustrative  
6 scenario in which Piedmont releases upstream capacity to restructure the  
7 portfolio based on the current forecasted projections.

8 **Q. Has the Company made any changes to its capacity rights during the**  
9 **Review Period?**

10 A. The Company did not make any changes to its capacity rights during the  
11 Review Period.

12 **Q. Does the Company plan for a reserve margin to accommodate statistical**  
13 **anomalies, unanticipated supply or capacity interruptions, force**  
14 **majeure, emergency gas usage or colder-than-design weather?**

15 A. Yes, the Company computes a five percent reserve margin and arranges for  
16 supply and capacity to provide delivery of the reserve margin for events such  
17 as those listed above. This reserve margin is reflected in **Exhibit\_\_\_ (JCP-**  
18 **5C).**

19 **Q. Is it possible to maintain capacity rights that exactly match Piedmont’s**  
20 **calculated Design Day demand plus reserve margin at all times?**

21 A. No. Capacity additions are acquired in “blocks” of additional transportation,  
22 storage, or LNG capacity, as current and future needs are identified to ensure  
23 Piedmont’s ability to serve its customers based on the options available at that

1 time. As a practical matter, this means that at any given moment in time,  
2 Piedmont's actual capacity assets will vary somewhat from its forecasted  
3 demand capacity requirements. This aspect of capacity planning is  
4 unavoidable but Piedmont attempts to mitigate the impact of any mismatch  
5 through its use of bridging services, capacity release, and off-system sales  
6 activities.

7 **Q. Please describe the Company's interest and position on any issues before**  
8 **the FERC that may have an impact on the Company's operations and a**  
9 **description of the status of each proceeding described.**

10 A. The Company routinely intervenes and participates in interstate natural gas  
11 pipeline proceedings before the FERC. A current summary of the proceedings  
12 in which Piedmont is a party is detailed in **Exhibit\_\_ (JCP-6)**.

13 **Q. Does this conclude your testimony?**

14 A. Yes, it does.

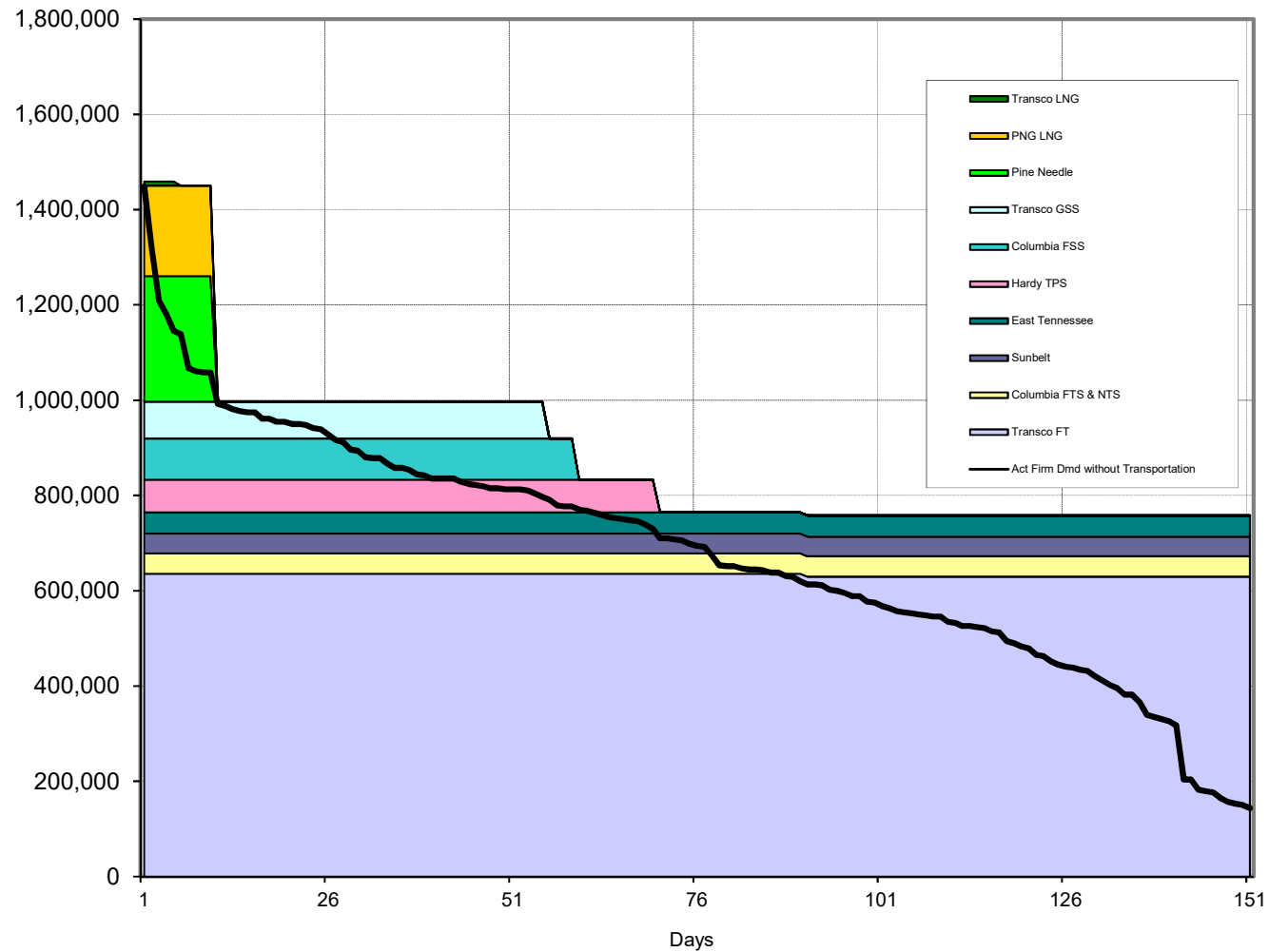


Index - JCP Exhibits

<u>Exhibit Number</u>	<u>Description</u>
JCP-1A	Winter 2019 - 2020 Forecast Load Duration Curve
JCP-1B	Winter 2019 - 2020 Actual Load Duration Curve
JCP-2	Winter 2020 - 2021 Forecast Load Duration Curve
JCP-3	2018 Weather Events
JCP-4A	Winter 2019 - 2020 Design Day Start Point
JCP-4B	Customer Growth - Actual and Projection for 2019-2020 planning
JCP-4C	Winter 2019 - 2020 Design Day Demand & Supply Schedule
JCP-5A	Winter 2020 - 2021 Design Day Start Point
JCP-5B	Customer Growth - Actual and Projection for 2020-2021 planning
JCP-5C	Winter 2020-2021 Design Day Demand & Supply Schedule
JCP-6	FERC Filings June 2019 - May 2020
JCP-7	Design Day Temperature

**Exhibit\_\_ (JCP-1A)**

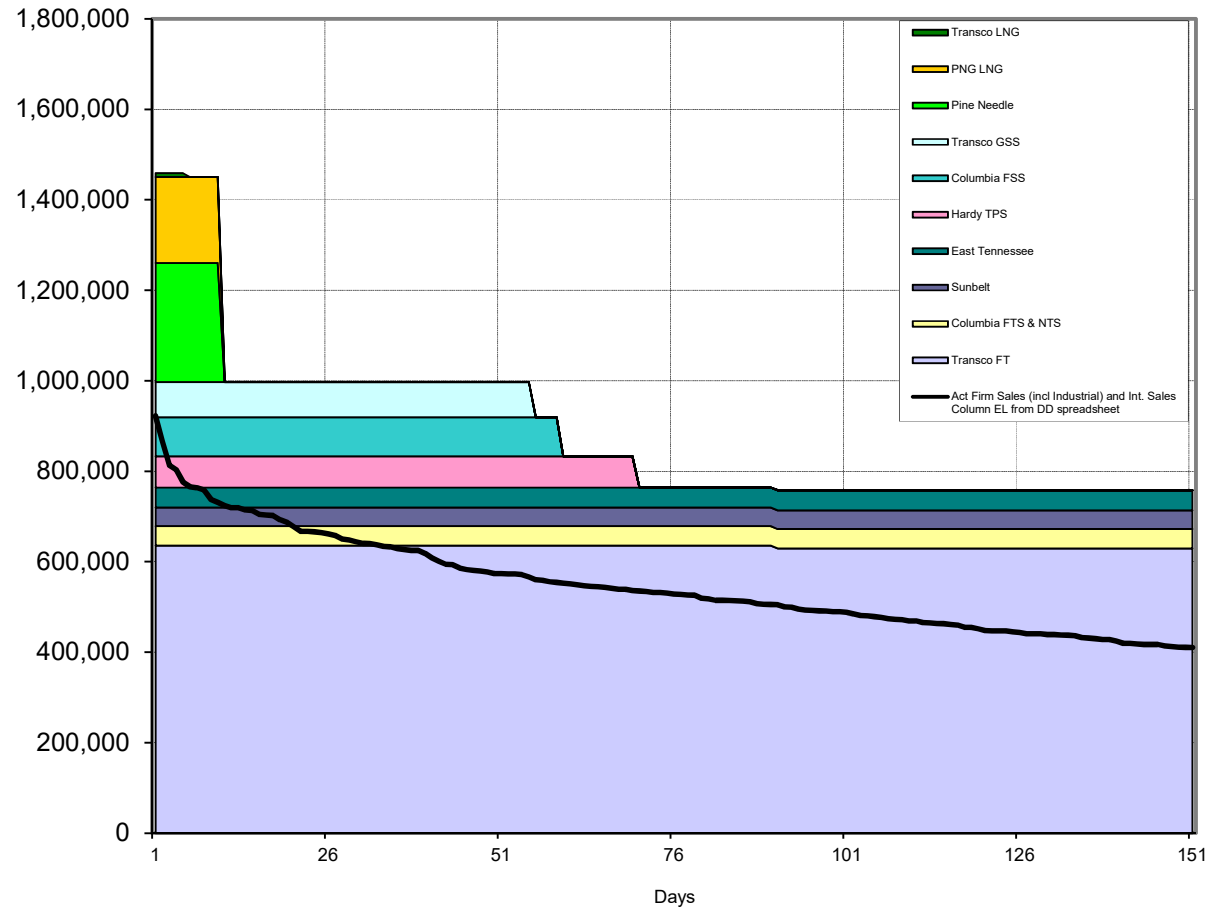
# **Forecast Winter 2019 - 2020 Load Duration Curve Design Winter - Total Carolinas**



May 2019

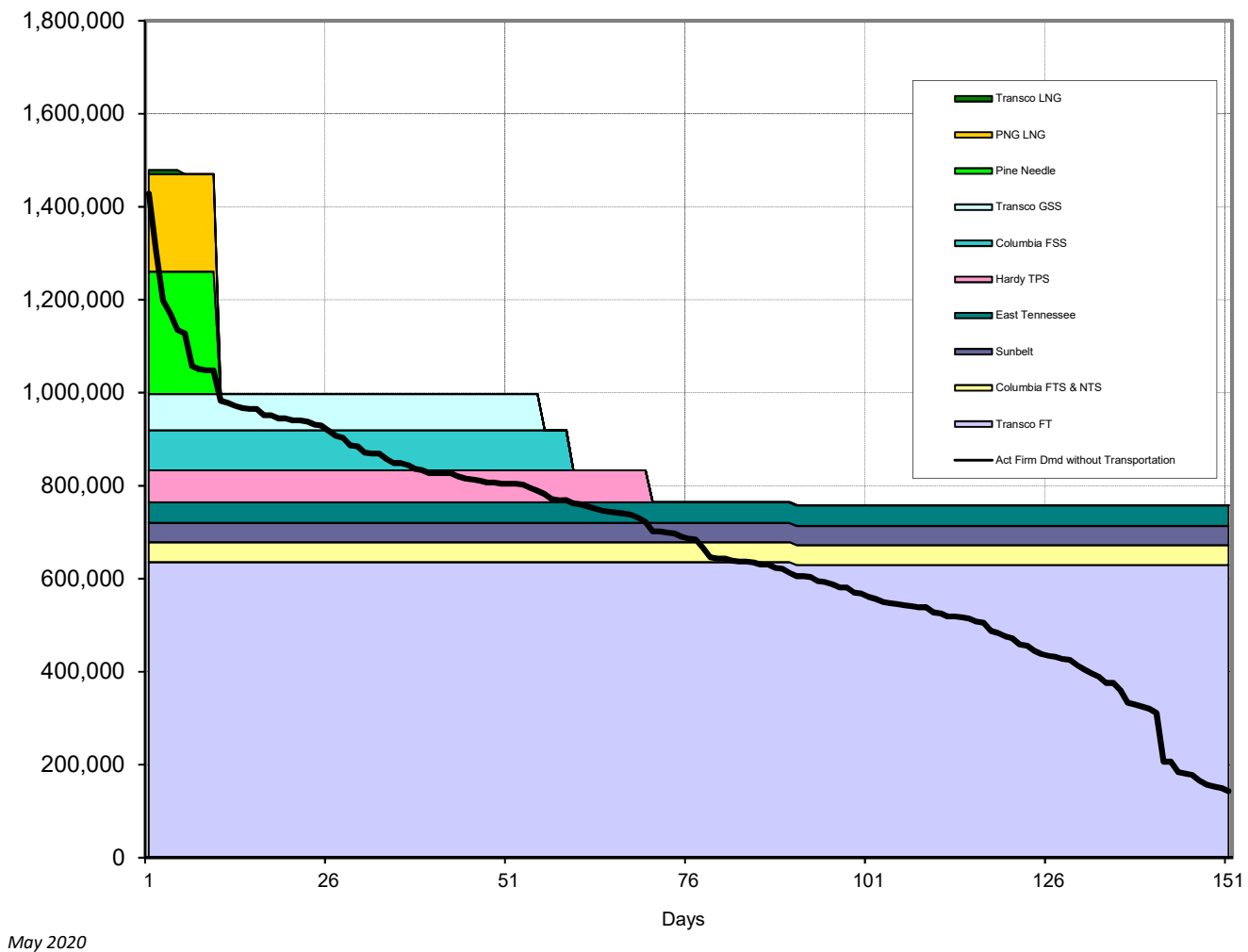
**Exhibit\_\_ (JCP-1B)**

# Winter 2019 - 2020 Load Duration Curve Actual Winter - Total Carolinas



# **Exhibit\_\_ (JCP-2)**

# Forecast Winter 2020 - 2021 Load Duration Curve Design Winter - Total Carolinas



# **Exhibit\_\_ (JCP-3)**



2017-2018 Weather Event

**Carolinas: December 2017 - January 2018 Cold Snap**

Date	Firm Sales & Firm Transportation Less Base Load	HDDs	Usage per HDD Less Base Load
12/30/2017	530,098	28.2	18,798
12/31/2017	836,623	41.3	20,257
1/1/2018	975,969	46.2	21,125
1/2/2018	1,011,608	42.0	24,086
1/3/2018	972,138	39.3	24,736
1/4/2018	1,037,719	44.5	23,320
1/5/2018	1,011,070	42.8	23,623
1/6/2018	1,015,633	44.8	22,670
1/7/2018	964,821	40.5	23,823
1/8/2018	714,357	27.8	25,696

All usage is in dekatherms.

Base load equals 164,485 dekatherms.

**Exhibit\_\_ (JCP-4A)**

Piedmont Natural Gas  
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Exhibit\_(JCP-4A)

## **Winter 2019 - 2020 Design Day Start Point**

### **Design Day Forecast 2019 - 2020**

### **Total Carolinas**

Baseload - Firm Sales & Firm Transport	211,454
Design Day Temperature	8.68
Design Day HDD	56.32

Estimated increase in FirmSIs & Trans Usage per degree day	22,439
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Total Firm SIs & Tran usage for total 56.32 HDDs	1,475,204
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TOTAL NEW FIRM SALES PICKED UP MID YEAR & ANNUAL ELECTIONS	2,371
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TOTAL FIRM SALES MOVED TO TRANSPORT ANNUAL ELECTIONS	(1,775)
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<b>TOTAL NET NUMBER - FIRM SALES PICKED UP</b>	596
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Firm Sales Contract Commitment - GE	333
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Firm Sales Contract Commitment - City of Wilson	3,900
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Firm Sales Contract Commitment - City of Rocky Mount	3,000
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Total Firm Sales Contract Commitment	7,233
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Prior Winter Firm Transport (Total FT DTs consumed on highest winter day)	134,427
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Date of occurrence - January 30, 2019	124,591 NC
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Date of occurrence - January 21, 2019	9,835 SC
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**Exhibit\_\_ (JCP-4B)**

Piedmont Natural Gas  
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Exhibit\_\_(JCP - 4B)

Customer Growth for Winter Design Day 2019-2020

Actual Customer Count by Year as of March 31 Through 2019  
Projected Customer Count by Year as of March 31 Through 2022

TOTAL RESIDENTIAL & COMMERCIAL CUSTOMER COUNT										
ACTUAL							PROJECTION			
	2013	2014	2015	2016	2017	2018	2019	2020	2021	2022
Total NC & SC	826,993	839,328	852,754	865,950	876,464	891,191	901,513	916,839	932,425	948,276
	1.06%	1.49%	1.60%	1.55%	1.21%	1.68%	1.16%	1.70%	1.70%	1.70%

**Exhibit\_\_ (JCP-4C)**

## Carolinas Design Day Demand & Supply Schedule - Winter 2019 - 2020

Design Day Temperature of 8.68 Degrees (56.32 HDDs)

(All Values in Dt/d)			Carolinas Demand	Net Growth Rate	1.67%	1.67%	1.67%	1.67%	1.67%
DEMAND				Winter Period:	2019 - 20	2020 - 21	2021 - 22	2022 - 23	2023 - 24
1	System Design Day Firm Sendout				1,499,840	1,525,494	1,550,969	1,576,871	1,603,204
2	Mid Year Firm Sales Pick Up				2,371				
3	Mid Year Firm Sales Deduct (move to Firm Transport)				(1,775)				
4	Subtotal Sendout plus Mid Year Pickup				1,500,436	1,525,494	1,550,969	1,576,871	1,603,204
5	Special Contract Firm Sales Commitment				7,233	7,233	7,233	7,233	7,233
6	Total Firm Design Day Demand				1,507,669	1,532,727	1,558,202	1,584,104	1,610,437
7	Reserve Margin on Design Day Demand (5%)				75,383	76,636	77,910	79,205	80,522
8	Subtotal Demand				1,583,053	1,609,363	1,636,112	1,663,309	1,690,959
9	Less:								
10	Firm Transportation Without Standby				(134,427)	(125,000)	(125,000)	(125,000)	(125,000)
11	Total Firm Sales Demand				1,448,626	1,484,363	1,511,112	1,538,309	1,565,959
12	SUPPLY CAPACITY								
13	Firm Transportation	Type of Contract	Days						
14	Transco	FT	365		301,016	301,016	301,016	301,016	301,016
15	Transco	FT	365		6,440	6,440	6,440	6,440	6,440
16	Transco	FT SE '94/95/96	365		129,485	129,485	129,485	129,485	129,485
17	Transco	Sunbelt	365		41,400	41,400	41,400	41,400	41,400
18	Transco	VA Southside	365		20,000	20,000	20,000	20,000	20,000
19	Transco	Leidy	365		100,000	100,000	100,000	100,000	100,000
20	Columbia Gas	FTS	365		9,801	9,801	9,801	9,801	9,801
	Columbia Gas	FTS	365		23,000	23,000	23,000	23,000	23,000
21	Columbia Gas	NTS	365		10,000	10,000	10,000	10,000	10,000
22	East TN (MGT Upstream)	FT	365		19,578	19,578	19,578	19,578	19,578
23	Atlantic Coast Pipeline *	FT	365		0	0	160,000	160,000	160,000
24	Total Year Round FT				660,720	660,720	820,720	820,720	820,720
25									
26	Transco	FT Southern Expansion	151		72,502	72,502	72,502	72,502	72,502
27	East TN (TETCO Upstream)	FT	151	1	24,798	24,798	24,798	24,798	24,798
28	Transco	FT	90		6,314	6,314	6,314	6,314	6,314
29	Total Winter Only FT				103,614	103,614	103,614	103,614	103,614
30									
31	Firm Transportation Subtotal				764,334	764,334	924,334	924,334	924,334
32									
33	Hardy Storage	HSS	70		68,835	68,835	68,835	68,835	68,835
34	Dominion	GSS	60	2	0	0	0	0	0
35	Columbia Gas	FSS/SST	59		86,368	86,368	86,368	86,368	86,368
36	Transco	GSS	55		77,475	77,475	77,475	77,475	77,475
37									
38	Total Seasonal Storage				232,678	232,678	232,678	232,678	232,678
39									
40	Peaking Capacity								
41	Piedmont	LNG - Huntersville	10		100,000	100,000	100,000	100,000	100,000
42	Piedmont	LNG - Bentonville	10		90,000	90,000	90,000	90,000	90,000
43	Transco	Pine Needle	10		263,400	263,400	263,400	263,400	263,400
44	Transco	LNG (formerly LG-A)	5		8,643	8,643	8,643	8,643	8,643
45	Piedmont	LNG - Robeson	TBD	3	0	0	TBD	TBD	TBD
46	Peaking Supplies Total				462,043	462,043	462,043	462,043	462,043
47									
48	Total Capacity				1,459,055	1,459,055	1,619,055	1,619,055	1,619,055
49					10,429	(25,308)	107,943	80,746	53,096

\* Atlantic Coast Pipeline scheduled to come on line in fourth quarter 2021

1East TN capacity is 365 days, however the upstream TETCO capacity delivering to East TN is 151 days

2Beginning in FY2015, Dominion capacity removed as available capacity on design day due to non-firm backhaul from Transco Zone 6.

3The facility is anticipated to be completed in the summer of 2021, and therefore is forecasted to provide peaking support starting winter 2021-2022. The capacity portfolio will be restructured to include Robeson LNG using the "best cost" gas purchasing policy while taking into account the customer load profile.

**Exhibit\_\_ (JCP-5A)**



Piedmont Natural Gas  
Docket No. 2020-4-G

Exhibit\_(JCP-5A)

## **Winter 2020 - 2021 Design Day Start Point**

### **Design Day Forecast 2020 - 2021**

### **Total Carolinas**

Baseload - Firm Sales & Firm Transport	209,260
Design Day Temperature	8.71
Design Day HDD	56.29

Estimated increase in FirmSIs & Trans Usage per degree day	22,313
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Total Firm SIs & Tran usage for total 56.29 HDDs	1,465,250
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TOTAL NEW FIRM SALES PICKED UP MID YEAR & ANNUAL ELECTIONS	735
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TOTAL FIRM SALES MOVED TO TRANSPORT ANNUAL ELECTIONS	(1,363)
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<b>TOTAL NET NUMBER - FIRM SALES PICKED UP</b>	<b>(628)</b>
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Firm Sales Contract Commitment - GE	333
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Firm Sales Contract Commitment - City of Wilson	3,900
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Firm Sales Contract Commitment - City of Rocky Mount	3,000
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Total Firm Sales Contract Commitment	7,233
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Prior Winter Firm Transport (Total FT DTs consumed on highest winter day)	136,653
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Date of occurrence - January 21, 2020	126,658 NC
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Date of occurrence - January 21, 2020	9,995 SC
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**Exhibit\_\_ (JCP-5B)**

**Customer Growth for Winter Design Day 2020-2021**

Actual Customer Count by Year as of March 31 Through 2020  
Projected Customer Count by Year as of March 31 Through 2023

TOTAL RESIDENTIAL & COMMERCIAL CUSTOMER COUNT										
Total NC & SC	ACTUAL							PROJECTION		
	<u>2013</u>	<u>2014</u>	<u>2015</u>	<u>2016</u>	<u>2017</u>	<u>2018</u>	<u>2019</u>	<u>2020</u>	<u>2021</u>	<u>2023</u>
	826,993	839,328	852,754	865,950	876,464	891,191	901,513	915,099	926,721	954,354
	1.06%	1.49%	1.60%	1.55%	1.21%	1.68%	1.16%	1.51%	1.27%	1.55%

**Exhibit\_\_ (JCP-5C)**

## Carolinas Design Day Demand & Supply Schedule - Winter 2020 - 2021

Design Day Temperature of 8.71 Degrees (56.29 HDDs)

(All Values in Dt/d)

Carolinas Demand Net Growth Rate

1.2674%

1.4098%

1.5465%

1.5506%

1.5545%

<b>DEMAND</b>				<b>Winter Period:</b>	<b>2020 - 21</b>	<b>2021 - 22</b>	<b>2022 - 23</b>	<b>2023 - 24</b>	<b>2024 - 25</b>
System Design Day Firm Sendout					1,483,821	1,504,104	1,527,365	1,551,049	1,575,159
Mid Year Firm Sales Pick Up					735				
Mid Year Firm Sales Deduct (move to Firm Transport)					(1,363)				
Subtotal Sendout plus Mid Year Pickup					1,483,194	1,504,104	1,527,365	1,551,049	1,575,159
Special Contract Firm Sales Commitment					7,233	7,233	7,233	7,233	7,233
Total Firm Design Day Demand					1,490,427	1,511,337	1,534,598	1,558,282	1,582,392
Reserve Margin on Design Day Demand (5%)					74,521	75,567	76,730	77,914	79,120
<b>Subtotal Demand</b>					<b>1,564,948</b>	<b>1,586,903</b>	<b>1,611,328</b>	<b>1,636,196</b>	<b>1,661,512</b>
Less:									
Firm Transportation Without Standby					(136,653)	(129,000)	(129,000)	(129,000)	(129,000)
<b>Total Firm Sales Demand</b>					<b>1,428,295</b>	<b>1,457,903</b>	<b>1,482,328</b>	<b>1,507,196</b>	<b>1,532,512</b>
<b>SUPPLY CAPACITY</b>									
<b>Firm Transportation</b>	<b>Type of Contract</b>	<b>Days</b>							
Transco	FT	365			301,016	301,016	301,016	301,016	301,016
Transco	FT	365			6,440	6,440	6,440	6,440	6,440
Transco	FT SE '94/95/96	365			129,485	129,485	129,485	129,485	129,485
Transco	Sunbelt	365			41,400	41,400	41,400	41,400	41,400
Transco	VA Southside	365			20,000	20,000	20,000	20,000	20,000
Transco	Leidy	365			100,000	100,000	100,000	100,000	100,000
Columbia Gas	FTS	365			9,801	9,801	9,801	9,801	9,801
Columbia Gas	FTS	365 <sup>4</sup>			23,000	0	0	0	0
Columbia Gas	NTS	365			10,000	10,000	10,000	10,000	10,000
East TN (MGT Upstream)	FT	365 <sup>4</sup>			19,578	0	0	0	0
Atlantic Coast Pipeline *	FT	365			0	0	160,000	160,000	160,000
<b>Total Year Round FT</b>					<b>660,720</b>	<b>618,142</b>	<b>778,142</b>	<b>778,142</b>	<b>778,142</b>
Transco	FT Southern Expansion	151			72,502	72,502	72,502	72,502	72,502
East TN (TETCO Upstream)	FT	151 <sup>1,4</sup>			24,798	0	0	0	0
Transco	FT	90			6,314	6,314	6,314	6,314	6,314
<b>Total Winter Only FT</b>					<b>103,614</b>	<b>78,816</b>	<b>78,816</b>	<b>78,816</b>	<b>78,816</b>
<b>Firm Transportation Subtotal</b>					<b>764,334</b>	<b>696,958</b>	<b>856,958</b>	<b>856,958</b>	<b>856,958</b>
Hardy Storage	HSS	70 <sup>4</sup>			68,835	0	0	0	0
Dominion	GSS	60 <sup>2</sup>			0	0	0	0	0
Columbia Gas	FSS/SST	59 <sup>4</sup>			86,368	5,199	5,199	5,199	5,199
Transco	GSS	55			77,475	77,475	77,475	77,475	77,475
<b>Total Seasonal Storage</b>					<b>232,678</b>	<b>82,674</b>	<b>82,674</b>	<b>82,674</b>	<b>82,674</b>
<b>Peaking Capacity</b>									
Piedmont	LNG - Huntersville	10			100,000	100,000	100,000	100,000	100,000
Piedmont	LNG - Bentonville	9.09			110,000	110,000	110,000	110,000	110,000
Transco	Pine Needle	10			263,400	263,400	263,400	263,400	263,400
Transco	LNG (formerly LG-A)	5			8,643	8,643	8,643	8,643	8,643
Piedmont	LNG - Robeson	10 <sup>3</sup>			0	200,000	200,000	200,000	200,000
<b>Peaking Supplies Total</b>					<b>482,043</b>	<b>682,043</b>	<b>682,043</b>	<b>682,043</b>	<b>682,043</b>
<b>Total Capacity</b>					<b>1,479,055</b>	<b>1,461,675</b>	<b>1,621,675</b>	<b>1,621,675</b>	<b>1,621,675</b>
					<b>50,760</b>	<b>3,772</b>	<b>139,347</b>	<b>114,479</b>	<b>89,163</b>

\* Atlantic Coast Pipeline scheduled to come on line in the first half of 2022

1East TN capacity is 365 days, however the upstream TETCO capacity delivering to East TN is 151 days

2Beginning in FY2015, Dominion capacity removed as available capacity on design day due to non-firm backhaul from Transco Zone 6.

3The Robeson LNG facility is anticipated to be completed in the summer of 2021, and therefore is forecasted to provide peaking support starting winter 2021-2022.

4The capacity portfolio for the 2021-2022 winter season and beyond will be restructured to include Robeson LNG using the "best cost" gas purchasing policy while taking into account the customer load profile. The removal of identified capacity contacts beginning with the 2021 - 2022 winter season represent an illustrative scenario in which Piedmont releases upstream capacity to restructure the portfolio based on the current forecasted projections.

**Exhibit\_\_ (JCP-6)**

Docket Number	Pipeline / Applicant	Deadline Date	Filed Date	Action	Description	Status of Docket
RP19-1043	Columbia Gas Transmission, LLC	4/15/2019	4/1/2019	Intervened for PNG on 04/15/2019	TCO is filing to lower its OTRA monthly reservation rate for the 2019 summer season to \$0.047 per Dth for Rate Schedule FTS service from the existing 2018 winter season rate of \$0.062 per Dth. The decrease reflects a reduction in current OTRA surcharge costs of approximately \$338,000, an increase of approximately \$510,000 in under-recovered OTRA true-up surcharge costs when compared with the previous winter OTRA season, and a projected increase in total seasonal billing determinants to approximately 102,000,000 Dths.	Several interventions were filed in this docket.  On 04/26/2019, a letter order was issued accepting Columbia Gas Transmission's filing.
CP19-191	Texas Eastern Transmission, LP	5/21/2019	4/18/2019	Intervened on 05/21/2019	TETCO is requesting authorization to replace two existing General Electric Company Frame 5 centrifugal natural gas-fired turbines consisting of one 22,000 horsepower (hp) unit installed in 1958, and one 19,800 hp unit installed in 1968, with a total station certificated horsepower of 41,800 hp. TETCO proposes to replace these two existing units with one new 26,000 hp Solar Turbine, Inc. Titan 250 natural gas-fired turbine and one new 18,100 hp Solar Titan 130 natural gas-fired turbine. TETCO states that it will install software controls on the 26,000 hp Solar Titan 250 turbine to limit the horsepower on that turbine to 23,700 hp, so that the total designed horsepower and delivery capacity at the Bernville Compressor Station will remain substantially the same. TETCO estimates the cost of the Project to be \$125,443,261 that will be rolled-in to existing rates.	On 12/19/2019, an Order Issuing Certificate and Approving Abandonment was issued.
RP19-1191	Columbia Gas Transmission, LLC	5/13/2019	5/1/2019	Intervened for PNG on 5/14/2019	TCO is filing to increase the recoverable Operational 858 Costs for the period June 1, 2019 through March 31, 2020 by \$6,383,617. The increase is driven primarily by the rate case increase in TETCO's transportation rates, which will result in a \$5,742,878 increase in the Operational 858 Costs.	On 03/05/2020, an Order Following Technical Conference was issued.
CP19-477	Mountain Valley Pipeline, LLC		6/4/2019	Intervened on 8/13/19		On 12/4/19, a Letter requesting Mountain Valley Pipeline LLC's to file a response for the environmental data request within 5 days to assist in FERC's analysis of the certificate application for the Greene Interconnect Project was filed.  On 12/5/19, Mountain Valley Pipeline filed a response to 12/4/19 Data Request.  On 12/10/19, a Procedural motion was filed.
RP19-1308	Transcontinental Gas Pipe Line Company, L.L.C.	6/17/2019	6/5/2019	Intervened for PNG on 6/17/2019	Transco is filing to track rate changes attributable to storage service purchased from TETCO under its Rate Schedule X-28 the costs of which are included in the rates and charges payable under Transco's Rate Schedule S-2.	Several motions to intervene have been filed.  On 06/26/2019, a letter order accepting Transcontinental Gas Pipeline Company filing of a tariff record to track rate changes attributable to storage service purchased from Texas Eastern Transmission, LP, under its Rate Schedule X-28 was issued.
CP19-501	Texas Eastern Transmission, LP	9/24/2019	8/19/2019	Intervened n 09/19/2019	"TETCO is filing an application for its proposed Bailey East Mine Panel 11J Project, to be effective on or before March 31, 2020. Texas Eastern proposes to excavate, elevate, and replace certain segments of four different pipelines and appurtenant facilities in Marshall County, West Virginia.  Tetco states that the Project is designed to ensure the safe and efficient operation of Texas Eastern's existing pipeline facilities for the duration of the longwall mining activities planned by CONSOL Energy, Inc., in the area beneath Texas Eastern's pipelines. The projected cost of the project is \$30.5 MM. Tetco will finance the costs of the project through funds on hand and borrowings under short-term financing arrangements."	On 03/24/20, an Order Issuing Certificate was issued.
CP19-508	Texas Eastern Transmission, LP	9/24/2019	8/19/2019	Intervened on 09/19/2019	TETCO is filing an application for its proposed Bailey East Mine Panel 11J Project, to be effective on or before March 31, 2020. Texas Eastern proposes to excavate, elevate, and replace certain segments of four different pipelines and appurtenant facilities in Marshall County, West Virginia.  Tetco states that the Project is designed to ensure the safe and efficient operation of Texas Eastern's existing pipeline facilities for the duration of the longwall mining activities planned by CONSOL Energy, Inc., in the area beneath Texas Eastern's pipelines. The projected cost of the project is \$30.5 MM. Tetco will finance the costs of the project through funds on hand and borrowings under short-term financing arrangements.	Several interventions were filed,

CP19-512	Texas Eastern Transmission, LP	10/30/2019	9/26/2019	Intervened for PNG on 10/22/2019	<p>Texas Gas is filing an Abbreviated Application for a Certificate of Public Convenience and Necessity to construct, own and operate the Cameron Extension Project facilities. Texas Eastern is also seeking approval to establish and charge initial incremental recourse reservation and usage rates and an incremental fuel percentage for firm service on the Project.</p> <p>TETCO states that the Project is designed to reverse natural gas flow on a portion of Texas Eastern's Line 41 mainline to provide natural gas from various sources to serve the Venture Global Calcasieu Pass Terminal, a liquefied natural gas export terminal project currently under development in Cameron Parish, Louisiana.</p> <p>Texas Eastern has executed a precedent agreement for firm service with Venture Global Calcasieu Pass, LLC pursuant to which Texas Eastern will provide 750,000Dth/day of firm transportation service for a primary term of 20 years. With Calcasieu Pass's firm commitment, the reverse flow capacity provided by the Project facilities is fully subscribed.</p> <p>Texas Eastern is requesting authorization to implement initial incremental recourse reservation and usage rates for firm transportation service on the Project facilities under Rate Schedule FT-1 and an incremental fuel retainage percentage that will apply to service provided on the Project facilities. The cost of the Project is \$149 MM. TETCO states that since Texas Eastern is proposing to recover the costs associated with the Project through incremental rates, and the capacity to be made available by the Project will be fully subscribed, the Project is financially viable without any adverse rate effect on, or subsidies from, Texas Eastern's existing customers. Texas Gas suggests that the construction and operation of the facilities will serve the public interest by providing long-term firm transportation service as requested by the Project Shipper to serve its needs and increasing market options along the Texas Eastern system.</p> <p>Although establishing incremental recourse rates and fuel for the Project will ensure that existing system shippers do not subsidize the Project, given the magnitude of the project, we recommend intervening.</p>	<p>On 02/4/20, TETCO submitted its response to the 01/16/20 Accounting Data Request.</p> <p>On 02/11/20, a letter order requesting TETCO to file a response to data request was filed.</p> <p>On 02/19/20, TETCO submitted its response to the 02/11/20 Data Request.</p> <p>On 02/27/20, a Notice of Revised Schedule for Environmental Review of the Cameron Extension Project was filed.</p>
RP20-145	Transcontinental Gas Pipe Line Company, LLC	11/12/2019	10/31/2019	Intervened on 11/12/2019	<p>Transco is filing to track rate changes attributable to storage services purchased from Dominion Transmission, Inc. under its Rate Schedule GSS. On September 30, 2019, Dominion filed revised tariff records in Docket No. RP19-1637- 000 in order to update its Electric Power Cost Adjustment and filed revised tariff records in Docket No. RP19-1638-000 in order to update its Transportation Cost Rate Adjustment. Included in those filings are revised rates under Dominion's Rate Schedule GSS that Transco uses to render service to its customers under its Rate Schedules GSS and LSS.</p> <p>Rate Schedule GSS: Since Piedmont operates under Rate Schedule GSS, we recommend intervening.</p>	Several other interventions were filed.
RP20-160	Texas Eastern Transmission, LP	11/12/2019	10/31/2019	Intervened for PNG on 11/12/2019	<p>"TETCO is filing tariff sections setting forth the rates under the Settlement from December 1, 2019, through November 30, 2020 (referred to herein as "Year 3" of the initial term extension). The tariff sections meet this requirement and reflect TETCO's estimate of its Year 3 Eligible PCB-Related Costs of approximately \$12,160,000 of which approximately \$6,992,000 is recoverable by TETCO pursuant to the Settlement. The total net recoverable PCB related costs of \$6,229,204 reflect an IT revenue credit of approximately \$14,714 and a deferred credit account balance of approximately \$748,083. Pursuant to Article VI.B.7 of the Settlement, however, the annual cap applies and Texas Eastern has reflected only \$5,000,000 in rates.</p> <p>Since this filing impacts rates, we recommend intervening.</p>	On 11/20/2019, a letter order accepting TETCO's filing of tariff records to comply with the 1991 Settlement were filed.
RP20-187	Columbia Gas Transmission, LLC	11/13/2019	11/1/2019	Intervened on 11/13/2019	<p>Columbia is proposing to increase its Operational Transaction Rate Adjustment ("OTRA") monthly reservation rate for Rate Schedule FTS service for the 2019 winter season to \$0.089 per Dth (as compared to \$0.047 per Dth for the 2019 summer season). The proposed rate reflects an increase in current OTRA costs of approximately \$2.5 million, which was partially offset by a decrease of approximately \$343,000 in OTRA under-recoveries. TCO states that the \$2.5 million increase is due to an increase in the volume of operational purchases required for the winter season and an increase in the basis spread between OTRA purchases and sales.</p> <p>Since Piedmont operates under Rate Schedule FTS, we recommend intervening.</p>	<p>Several other interventions were filed.</p> <p>On 11/19/2019, a letter order accepting Columbia Gas' filing of tariff records to its FERC NGA gas tariff.</p>
RP20-211	Transcontinental Gas Pipe Line Company, LLC	11/18/2019	11/6/2019	Intervened on 11/18/19	<p>Transco is filing is to revise the Momentum Expansion Project tariff record to set forth a Zone 5 to Zone 5 reservation recourse rate. On September 26, 2019, the service agreement under Rate Schedule FT between Transco and Southern Company Services, Inc. under the Project was amended to change the traditional delivery locations on the agreement, which shortened the primary path of the agreement. As a result of this amendment, Transco now has available Project capacity with a contract path from receipt points in Zone 5 to delivery points in Zone 5. Project capacity with this limited path was not available prior to September 26, 2019; therefore, no Zone 5 to Zone 5 reservation recourse rate for the Project was stated in the Tariff.</p> <p>Transco states that the proposed Zone 5 to Zone 5 reservation recourse rate is based on the costs underlying the currently effective rates for the Project. The proposed Zone 5 to Zone 5 reservation rate is calculated by adding the Zone 5 volumetric and zonal rate components together for a proposed rate of \$0.12949. Because there is currently a Zone 5 to Zone 5 usage rate for transportation under the Project, no additional usage rate is being proposed.</p> <p>Transco requests that the tariff record be made effective December 7, 2019. If Piedmont intends to subscribe to capacity within this limited path, we recommend intervening. Please advise.</p>	<p>Other interventions were filed.</p> <p>On 11/22/19, a letter order accepting Transco's filing of a revised tariff record to reflect a new Zone 5 to Zone 5 reservation recourse rate applicable to its Momentum Expansion Project was issued.</p>
RP20-239	Tennessee Gas Pipeline Company, L.L.C.	12/3/2019	11/21/2019	Intervened for AEC on 12/3/2019	<p>Tennessee filed its 2019 Cashout Report. The 2019 Cashout Report reflects that Tennessee's cashout operations for this period experienced a loss of \$1,084,870, resulting in a cumulative loss as of August 31, 2019 of \$28,759,075. In accordance with the cashout provisions of Rate Schedules LMS-MA and LMS-PA of Tennessee's Tariff, Tennessee will roll forward this cumulative loss into its next annual cashout period.</p> <p>Piedmont intervened in TGP's 2018 Cashout filing (RP19-365). In light of the continuing high cumulative loss amount, we recommend intervening in this year's docket as well.</p>	Several other interventions were filed.



RP20-322	Texas Eastern Transmission, LP	12/23/2019	12/11/2019	Intervened for PNG on 12/23/2019	<p>TETCO is filing to revise its tariff records to incorporate revisions accepted by the Commission, to be effective December 24, 2019, or the date the Stratton Ridge Expansion Project facilities are placed into service.</p> <p>Since the Project facilities have not been placed into service, TETCO has not yet filed an in-service commencement notification, nor has it made an informational filing with the Commission through the eTariff portal. As such, the status of the tariff records filed by TETCO on April 2, 2019 have not yet been marked as "Effective" in the Commission's eTariff database and currently appear as "Superseded."</p> <p>Subsequent to the April 2 Filing, TETCO made a series of filings, each of which modified one or more of the tariff records filed in the April 2 Filing. As a result of the uncertainty as to the in-service date of the Project and the acceptance by the Commission of subsequently filed tariff records, the tariff records filed in the April 2 Filing and accepted by the Commission do not include the revisions subsequently accepted by the Commission. Therefore, TETCO is proposing to modify the currently effective versions of the tariff records to incorporate the revisions which were accepted by the Commission on May 7, 2019.</p>	<p>Several interventions were filed.</p> <p>On 12/26/2019, TETCO submitted a tariff filing: Stratton Ridge Sync-Up In-Service Notification.</p>												
CP19-26	Dominion Energy Transmission, Inc.	12/11/2018	12/18/2019	Intervened on 1/22/2019	<p>DETI is requesting authorization to construct, own, and operate its West Loop Project which consists of approximately 5.1 miles of 36-inch diameter pipeline looping parallel to the existing TL-400 line, from Koppel Junction Site heading west to a new gate site in Beaver County, Pennsylvania. The project also comprises minor changes to existing facilities at the Beaver Compressor Station in Beaver County, Pennsylvania and the Old Petersburg Regulation Facility in Lawrence County, Pennsylvania, and re-wheeling two centrifugal compressors at the existing Carroll Compressor Station in Carroll County, Ohio. DETI states that the proposed facilities will enable it to provide 150,000 dekatherms per day of firm transportation service from Pennsylvania to Ohio for delivery to a proposed natural gas-fired combined cycle electric power generation facility to be located in Columbiana County, Ohio. Dominion estimates the cost of the West Loop Project to be \$94,203,462.</p>	<p>On 12/19/19, an Order Issuing Certificate was issued.</p> <p>On 12/23/19, Dominion filed its Acceptance Letter of the West Loop Order.</p> <p>On 12/26/19, Dominion filed its Implementation Plan of the West Loop Project.</p> <p>On 12/30/19, The Pennsylvania Department of Environmental Protection submitted the 401 Water Quality Certification for the West Loop Project.</p>												
RP20-376	Columbia Gas Transmission, LLC	1/13/2020	12/30/2019	Intervened on 01/13/2020	<p>Columbia is filing to revise the Maximum Monthly Injection Quantity ("MMIQ") percentage of a shipper's Storage Contract Quantity ("SCQ") under Rate Schedules FSS and FSS-M that may be injected during the months of August and October, to become effective February 1, 2020.</p> <p>Columbia explains that it is experiencing a late season mismatch in injectability between the current Tariff threshold and system capabilities for the month of August. Accordingly, Columbia proposes to revise the MMIQ percentage of a shipper's SCQ under Rate Schedules FSS and FSS-M that may be injected during the month of August to align Columbia's late season injection thresholds with system capabilities.</p> <p>Additionally, to avoid affecting a shipper's overall aggregate storage injection rights, Columbia is also proposing to revise the MMIQ percentage which may be injected during the month of October. Columbia is proposing to reduce the existing MMIQ percentage of a shipper's SCQ for the month of August by 2% (from 20% to 18%), with an offsetting 2% increase in the MMIQ percentage for the month of October (from 7% to 9%), as further outlined below:</p> <table><tr><td>January 10%</td><td>May 20%</td><td>September 13%</td></tr><tr><td>February 10%</td><td>June 20%</td><td>October 9%</td></tr><tr><td>March 10%</td><td>July 20%</td><td>November 5%</td></tr><tr><td>April 15%</td><td>August 18%</td><td>December 10%</td></tr></table> <p>Columbia is not proposing to adjust the calculation of a shipper's MDIQ. A shipper's MDIQ for the months of January through October will continue to be calculated as 1/25th of its MMIQ. During the months of November and December a shipper's MDIQ will continue to be calculated as 1/30th of the shipper's MMIQ. Based upon the cumulative monthly quantities set forth in the Tariff, shippers utilizing Rate Schedule FSS and FSS-M will continue to have the flexibility to inject 115% of their SCQ during the traditional April to October injection season. Shippers will continue to be allowed no more than 60% of their SCQ in storage as of June 30 of any year, and no more than 85% of its SCQ in storage as of August 31.</p> <p>Review of Alternatives</p> <p>In mid-2018, Columbia initiated an internal review of storage injection capability and discussed changing the MDIQ calculation to reduce customer obligations and align Columbia's system with actual capabilities.</p> <p>Additionally, Columbia reviewed facility construction solutions as alternatives to reducing storage injection obligations. Columbia identified two facility construction solutions, the "Complete Solution" and the "Cost-Optimized Solution." The Complete Solution included facility modifications at three compressor stations, additional compression, and the construction of 8.5 miles of looping pipeline in Northern Ohio as well as facility improvements at the Terra Alta Storage Field. The Complete Solution would fully build out capability in Ohio and would allow the injection capability to exceed the current tariff MDIQ, but would require approximately \$161 Million of capital investment. The scope of work for the Cost Optimized Solution included everything included within the Complete Solution except the 8.5 miles of looping pipeline in Northern Ohio. The Cost-Optimized Solution would reduce the required capital investment to approximately \$74 Million, but would not maximize Ohio capability and would be less flexible than the Complete Solution. After a complete review of these alternatives, Columbia believes that the proposal in the instant filing is the optimal solution both operationally and economically.</p> <p>Since Piedmont operates under Rate Schedule FSS, it will be impacted by this filing. As such, we recommend intervening. Please let us know if comments or a protest are warranted.</p>	January 10%	May 20%	September 13%	February 10%	June 20%	October 9%	March 10%	July 20%	November 5%	April 15%	August 18%	December 10%	<p>Several other interventions were filed.</p> <p>On 1/17/20, a letter order accepting Columbia's filing of tariff records to revise the maximum monthly injection quantity percentages of a shipper's storage contract quantity under Rate Schedule FSS and FSS-M.</p>
January 10%	May 20%	September 13%																
February 10%	June 20%	October 9%																
March 10%	July 20%	November 5%																
April 15%	August 18%	December 10%																

RP20-382	Columbia Gas Transmission, LLC	1/13/2020	12/31/2019	Intervened on 1/14/20	<p>Columbia is filing to establish revised CCRM Daily Rates (see below). Columbia has allocated its Capital Revenue Requirement utilizing billing determinants in effect from February 1, 2020 through January 31, 2021. Columbia's proposed CCRM Rates are proposed to become effective February 1, 2020.</p> <p>Rate Schedule Effective CCRM Rates Proposed CCRM Rates</p> <p>FTS 1.56 2.60 NTS 1.56 2.60 NTS-S 1.56 2.60 ITS Summer 1.04 1.73 ITS Winter 1.56 2.60 GTS 3.12 5.19 OPT-30 1.43 2.38 OPT-60 1.30 2.16 TPS 1.56 2.60 SST 1.56 2.60</p> <p>Piedmont operates under Rate Schedules FTS, SST, FSS, NTS, TPS. We recommend intervening in light of the filing's impact on rates, and because Piedmont typically intervenes in TCO's CCRM filings.</p>	Several other interventions were filed.
RP20-455	Transcontinental Gas Pipe Line Company, LLC	1/29/2020	1/29/2020	Intervened on 02/06/2020	<p>On May 16, 2019, Transco filed tariff records in Docket No. RR19-1225-000 to comply with the Commission's September 7, 2018 order issued in Docket No. RP18-314-000 (this was the docket that addressed Transco's Priority of Service filing). You may recall that DEC and DEP were very active in this docket. We filed a protest and requested a technical conference, and filed post- and reply comments following the technical conference. Duke's primary objection with Transco's filing related to its proposal to discontinue its business practice of attributing a transportation path to High Burn Limit Values (HBLVs). You can access the RP18-314 docket here: <a href="https://elibrary.ferc.gov/idmws/docket_sheet.asp">https://elibrary.ferc.gov/idmws/docket_sheet.asp</a></p> <p>The Commission ultimately accepted Transco's Priority of Service compliance filing, and the tariff records became effective on July 1, 2019. Transco is now proposing to revise certain tariff records which either were pending Commission action when the Priority of Service Compliance Filing was submitted or require clarifying revisions as part of the implementation of the Filing. The most significant change proposed in this filing, which DEC/DEP may want to protest is as follows: • Removing language from Section 18.1 (a) of the GT&amp;Cs of its Tariff (Determination of Deliveries at Swing Service Delivery Points) ("SSDPs"), related to the option for delivery point operators to use the Buyer ID/Downstream ID allocation level for predetermined allocations ("PDA") provided to Transco. Swing Service Delivery Points are defined in Section 2(r) of the GT&amp;C as locations where an LDC, municipality, industrial customer, or power generation plant takes deliveries from Transco's system. Transco proposes to remove the Buyer ID/Downstream ID allocation level option because, with the July 1, 2019 implementation of the Priority of Service Compliance Filing, there is no longer a presumed transportation path associated with high burn limit values (a component of PDAs) at SSDPs, and with no path, there are no "upstream" or "downstream" parties. High burn limit values are a component of the PDAs provided by delivery point operators at SSDPs. They are the quantity limits set by the delivery point operators to be used in the allocation of measured quantities at SSDPs when the measured quantities exceed the scheduled quantities.</p> <p>Consequently, Transco contends that the Buyer ID/Downstream ID allocation level option has no relevance at SSDPs and states that Delivery point operators will continue to have the option to provide PDAs at SSDPs using one of the three remaining allocation levels: Contract, Nomination/Package ID, and Transaction. The filing also states that the Buyer ID/Downstream ID allocation level will remain an option for PDAs at pipeline interconnects, production facilities, and delivery points that are not SSDPs. Other less significant changes that Transco is proposing in this filing are as follows:</p> <ul style="list-style-type: none"><li>• Transco proposes to revise Section 35 of the GT&amp;C, Standards for Business Practices, in order to reinstate revisions that were accepted by the Commission as part of the Priority of Service Compliance Filing effective July 1, 2019. At the time of the Filing, an earlier version of Section 35, which predated and did not include the revisions associated with the Filing, was pending Commission action in Transco's filing to comply with the requirements established in Order No. 587-Y (Docket No. RP19-885-000). On July 29, 2019, the Commission issued an order accepting the tariff records submitted in Docket No. RP19-885-000 effective August 1, 2019. As a result, the August 1, 2019 version of Section 35, which supplanted the July 1, 2019 version, omitted the revisions contained in the July 1, 2019 version. Those revisions are reinstated in this filing.</li><li>• As part of the implementation of the Priority of Service Compliance Filing, Transco created a new pooling point, the Station 95 pool in Zone 4. As a result, there are now two pooling locations in Zone 4 – at Station 85 and Station 95. To properly reflect that fact, Transco proposes revisions in certain transportation rate and fuel tariff records to replace, where applicable, the line "Sta 85 Zn 4 Pool" with "Zn 4 Pools" and to pluralize references to the Zone 4 pool, i.e., Zone 4 pools</li></ul> <p>Transco is requesting an effective date of February 29, 2020.</p>	<p>Several interventions were filed.</p> <p>On 02/26/20, a letter order accepting Transco's 01/29/20 tariff filing records to reflect various updates and clarifications was filed.</p>

CP20-50	Tennessee Gas Pipeline Company, LLC	3/13/2020	2/7/2020	Intervened on 03/10/20	<p>Tennessee is requesting authorization to construct the Evangeline Pass Expansion Project in Louisiana. Tennessee proposes to: (i) construct, operate and maintain approximately 9.1 miles of 36-inch-loop pipeline along Tennessee's existing 24-inch Toca 529D-100 Yscloskey Lateral located in St. Bernard Parish, Louisiana; (ii) construct, operate and maintain approximately 4.0 miles of 36-inch-loop pipeline, along Tennessee's existing 36-inch 500-2 Pipeline in Plaquemines Parish, Louisiana; and (iii) construct, operate and maintain a new 23,470 hp compressor station, CS 529, along Tennessee's existing 500 line system at mainline valve 529 in St. Bernard Parish, Louisiana.</p> <p>In conjunction with the Project, Tennessee will replace certain facilities including a like-for-like replacement of two 10,410 hp units at its existing Compressor Station 527 located in Plaquemines Parish, Louisiana. Tennessee also seeks to acquire lease capacity from Southern Natural Gas Company, L.L.C. (see summary below) pursuant to a lease agreement between the parties. Tennessee estimates the cost of the project to be \$261 million.</p> <p>Given the magnitude of the project, we recommend intervening.</p>	<p>Several other parties have intervened.</p> <p>Several protests were filed.</p> <p>On 03/19/20, Tennessee submitted its pre-construction noise survey and air permit application for C 527 along with other agency correspondence.</p> <p>On 03/20/2020, a Notice of Intent to Prepare an Environmental Assessment for the Proposed Evangeline Pass Expansion Project and Request for Comments on Environmental Issues was filed.</p> <p>On 03/31/2020, a motion for leave and answer of Tennessee and Southern Natural was filed.</p>
RP20-556	Midwestern Gas Transmission Company	3/9/2020	2/26/2020	Intervened on 03/09/2020	<p>Midwestern is filing to revise a tariff record to reflect Midwestern's annual adjustment to its fuel retention percentage, to be effective April 1, 2020. The revised tariff record submitted herewith reflects a change in the FRP adjustment applicable under Midwestern's Rate Schedule(s) FT-A, FT-B, FT-C, FT-D, FPAL, and PAL from 0.98 percent to 1.00 percent. The proposed FRP includes a change in the Fuel Use Rate from 0.82 percent to 0.84 percent and an unchanged Fuel Loss Rate of 0.16 percent.</p> <p>We do not think it is necessary to intervene. However, since PNG operates under two of the affected Rate Schedules: FT-A and FT-B, it may want to intervene. Please advise.</p>	<p>On 03/12/2020, a letter order accepting Midwestern's filing of a tariff record to adjust its fuel retainage percentage of its FERC gas tariff was issued.</p>
RP20-572	Transcontinental Gas Pipe Line Company, LLC	3/10/2020	2/27/2020	Intervened on 03/10/20	<p>Transco is filing its redetermination of its fuel retention percentages applicable to transportation and storage rate schedules, to be effective April 1, 2020. The derivation of the revised fuel retention percentages is based on Transco's estimate of gas required for operations for the forthcoming annual period April 2020 through March 2021 plus the balance accumulated in the Deferred GRO Account at January 31, 2020, the end of the annual deferral period. The proposed changes in the transportation and storage fuel retention percentages are:</p> <p>Transco proposes a decrease to its system transportation FRPs. The primary reasons for the decrease is that 1) the estimated GRO for this annual period, which is computed using the prior year's actual GRO is less than the estimated GRO used in the 2019 fuel tracker filing and 2) the system transportation Deferred GRO Account balance is less than the balance in the 2019 fuel tracker filing. The primary reasons for the decrease in the New York Bay Incremental Transportation fuel retention percentage are 1) the Deferred GRO Account balance is less than the balance in the 2019 fuel tracker filing and 2) the Zone 6 System Transportation rate, which is assessed to New York Bay service, decreased. The primary reasons for the increase in the Rate Schedule GSS fuel retention percentage are 1) the estimated GRO for this tracker period, which is computed using the prior year's actual GRO, is greater than the estimated GRO used in the 2019 tracker filing, 2) the Deferred GRO Account balance is greater than the balance in the 2019 fuel tracker filing and 3) the billing determinants, which are based on the prior year's actual injections, are lower than those included in the 2019 fuel tracker filing. The primary reasons for the Rate Schedule WSS fuel retention percentage increase are 1) the estimated GRO for this tracker period, which is computed using the prior year's actual GRO, is greater than the estimated GRO used in the 2019 tracker filing and 2) the Deferred GRO Account balance is greater than the balance in the 2019 fuel tracker filing. Transco is making a number of filings recently. Further, Piedmont historically intervenes in fuel related filings. As such we recommend intervening.</p>	<p>On 03/10/20, a Joint and Several Motion to Intervene of the Municipal Gas Authority of Georgia and the Transco Municipal Group was filed.</p> <p>On 03/12/20, a letter order accepting Transco's filing of tariff records to adjust the fuel retention percentages applicable to its transportation and storage rate schedules was filed.</p>
RP20-575	Transcontinental Gas Pipe Line Company, LLC	3/10/2020	2/27/2020	Intervened on 03/10/20	<p>Transco is filing to reflect net changes in the Transmission Electric Power rates, to be effective April 1, 2020. The TEP rates are designed to recover transmission electric power costs for electric compressors and gas coolers located at Transco's compressor station locations. The costs underlying the revised TEP rates consist of two components – the Estimated TEP Costs for the period April 1, 2020 through March 31, 2021 and the balance in the TEP Deferred Account as of January 31, 2020. The tables below show the proposed change in the transportation TEP rates.</p> <p>Transco proposes a decrease to its system demand TEP rates and an increase to its system commodity TEP rates. The primary reason for the decrease in the demand TEP rates is that the TEP Deferred Account balance is less than the balance in the 2019 electric power tracker filing. The primary reason for the increase in the commodity TEP rates is that the TEP Deferred Account balance is greater than the balance in the 2019 electric power tracker filing.</p> <p>As with the filing above, we recommend intervening in this docket.</p>	<p>Several other interventions were filed.</p> <p>On 03/10/20, a Joint and Several Motion to Intervene of the Municipal Gas Authority of Georgia and the Transco Municipal Group was filed.</p> <p>On 03/12/20, a letter order accepting Transco's filing of tariff records reflecting net changes to its Transmission Electric Power rates of its FERC Gas Tariff was issued.</p>

RP20-614	Transcontinental Gas Pipe Line Company, LLC	3/11/2020	2/28/2020	Intervened on 03/11/20	<p>Transco is filing to revise the calculations establishing the prices used for cashing out monthly imbalances remaining at the time of final resolution, to be effective April 1, 2020. Transco proposes these revisions in order to reduce the incentive for Transco's shippers and parties to Operational Balancing Agreements to intentionally create large imbalances subject to cash-out for the purpose of taking advantage of differences between spot market prices and Transco's cash-out prices.</p> <p>Transco proposes to revise the calculation of its cash-out prices in order to reduce shippers' ability to predict and arbitrage cash-out pricing, thereby reducing shippers' incentive to create large imbalances and large imbalance swings at the end of the production month. Specifically, Transco proposes to calculate the arithmetic averages of the Platts Gas Daily, "Final Daily Price Survey" high Common and low Common index prices specified for each zone, using the seven highest daily prices and the seven lowest daily prices, respectively, in the relevant month. The arithmetic average of the seven highest daily high Common prices in the month will be the Reference Spot Price "Sell," and the arithmetic average of the seven lowest daily low Common prices in the month will be the Reference Spot Price "Buy." The proposed calculation will no longer use the published Midpoint prices, or the prices published for the first seven days of the subsequent month.</p> <p>In addition, Transco has included more than one reference index price for zones 2, 5, and 6 to provide a more accurate reflection of the market prices in those zones. In the zones where Transco has included more than one index spot price, the calculated high averages for each referenced index will be averaged to determine the Reference Spot Price "Sell" and the calculated low averages for each referenced index will be averaged to determine the Reference Spot Price "Buy." Transco proposes to use four new reference indexes in order to better reflect market prices in its cash-out prices. In addition, in response to concerns from shippers, Transco proposes to increase from 1,000 dt to 5,000 dt the imbalance tolerance levels that are cashed out at a non-penalty price or Weighted Average Spot Price, as applicable.</p> <p>Transco will no longer use two separate cash-out prices in Zone 6, one for OIA 3 and one for OIA 4, and instead will use a single cash-out price for Zone 6. However, imbalances will continue to be held by OIA in Zone 6. The purpose of this change is to disincentivize price arbitrage between OIA 3 and OIA 4. There were significant cash-out price differences between OIA 3 and OIA 4 in twenty of the twenty-four months, and Transco was often in the position of buying high and selling low.</p> <p>Transco submits that the proposed changes to its cash-out pricing mechanism are necessary to deter price arbitrage by shippers and do not go beyond what is necessary to deter that conduct and the attendant operational problems, which its existing cash-out pricing mechanism is insufficient to deter. Transco has determined that the use of the seven highest and lowest daily prices for the month is the least restrictive modification to the cash-out pricing mechanism that can be made to minimize that arbitrage.</p> <p>Transco proposes to include additional Platts Gas Daily, "Final Daily Price Survey" index prices in the calculation of its cash-out prices: "Tennessee, 800 Leg," for Zone 2; "Transco, zone 5 North," and "Transco, zone 5 South" for Zone 5; and "Transco, zone 6 non-N.Y. North" for Zone 6.</p> <p>Finally, Transco has made conforming changes to Rate Schedules EESWS and PAL and Sections 18 and 25 of the GT&amp;C to update the references to cash-out pricing. The proposed revisions to Transco's cash-out mechanism are necessary in order to limit shippers' ability to predict cash-out pricing and disincentivize shippers from manipulating their imbalance positions to take advantage of the differences between gas market prices and Transco's cash-out prices. By deterring arbitrage, these proposed revisions will help Transco avoid the operational issues caused from large imbalance swings that threaten Transco's ability to provide firm services.</p>	<p>Several interventions and protests were filed.</p> <p>On 03/23/2020, a Motion for Leave to Answer and Answer of Transco to certain issues raised by various intervenors and protests was filed.</p> <p>On 03/26/2020, a Motion for Leave to Answer and Answer of Cabot Oil &amp; Gas to Transco's Answer was filed.</p> <p>On 03/30/20, an Order Accepting and Suspending Tariff Records, Subject to Refund, and Established Hearing Procedures was issued.</p>
RP20-615	Columbia Gas Transmission, LLC	3/11/2020	2/28/2020	Intervened on 03/11/2020	<p>Columbia is filing a revised section of the Currently Effective Rates set forth in its Tariff, to adjust Columbia's retainage percentage consistent with the pipeline's Retainage Adjustment Mechanism, to become effective April 1, 2020.</p> <p>This revision represents Columbia's annual RAM filing to effectuate an adjustment to Retainage Percentages for prospective changes and unrecovered quantities. There are no substantive changes to Retainage Percentages with the exception of the Ohio Storage Gas Loss Retainage Percentage. The calculation of the Ohio Storage Retainage Percentage is based on the 2019 annual turnover of approximately 3 Bcf, compared to the prior's year's filing, which was based on the 2018 annual turnover of approximately 4 Bcf. In addition, due to a decrease in the 2019 actual versus projected turnover, the retainage surcharge reflects an under-recovery of 9,815 Dths, in contrast to last year's retainage surcharge which was based on an over-recovery of 4,346. Consequently, Columbia proposes to increase the Ohio Storage Retainage Percentage from its current 0.470% rate to 1.220%.</p> <p>Piedmont typically intervenes in TCO's RAM filings. As such, we recommend intervening.</p>	<p>Several interventions were filed.</p> <p>On 03/27/20, a letter order accepting Columbia's tariff record filing to reflect the adjustment of its retainage percentage consistent with the RAM in its tariff was accepted.</p>

RP20-618	Transcontinental Gas Pipe Line Company, LLC	3/11/2020	2/28/2020	Intervened on 03/11/2020	<p>Transco is filing to revise Section 15 of its GT&amp;C, "Refund of Cash-out Revenues," to change the procedures used to address over- or under-recoveries resulting from the difference between the revenues received and the costs incurred by Transco under the cash-out provisions of Transco's Tariff ("Cash-Out Reconciliation Mechanism"). Specifically, Transco proposes to revise the Cash-Out Reconciliation Mechanism to establish a refund or surcharge rate designed to return to or recover from customers any over- or under-recovery of costs incurred under the cash-out provisions of the Tariff during an annual period.</p> <p>Transco is proposing to revise Section 15 of the GT&amp;C to set forth a new Cash-Out Reconciliation Mechanism. Under this mechanism, Transco would establish for each annual cash-out billing period a surcharge or refund rate, as applicable, that would be used to amortize the difference between revenues received and costs incurred from the operation of Transco's cash-out program. The net difference between cash-out revenues received and costs incurred will be accumulated in a "Cash-Out Deferred Account." The proposed surcharge/refund rate will be calculated by dividing the balance in the Cash-Out Deferred Account by the sum of the following quantities corresponding to the same annual billing period as the Cash-Out Deferred Account:</p> <p>(i) the quantities delivered under firm and interruptible transportation rate schedules subject to cash-out (excluding transportation transactions within a zone to pooling points in Zones 4A, 4, 5, and 6)(ii) the quantities delivered under Transco's bundled storage rate schedules GSS, LSS, and SS-2 (iii) the measured quantities under OBAs that are subject to cash-out.</p> <p>Beginning November 1 of each year, the surcharge or refund rate will be assessed on the commodity/usage charges being billed at the time on the then current quantities delivered under (i) firm and interruptible transportation rate schedules subject to cash-out (excluding transportation transactions within a zone to pooling points in Zones 4A, 4, 5, and 6) and (ii) bundled storage rate schedules GSS, LSS, and SS-2; and (iii) on the then current measured quantities under OBAs that are subject to cash-out. The surcharge amounts collected, or refund rate amounts paid, will be accounted for as revenues received or costs incurred, respectively, under the operation of Transco's Cash-Out Reconciliation Mechanism. Any over- or under-recoveries of the Cash-Out Deferred Account will be carried forward to the subsequent deferral period and incorporated into the determination of the surcharge or refund rate for the next annual period beginning November 1.</p> <p>Transco also proposes conforming changes to other Tariff sections that reference Section 15 of the GT&amp;C, in order to establish a more balanced mechanism for the timely resolution of over- or under-recoveries in the Cash-Out Reconciliation Mechanism. To address the current incentives for shippers to arbitrage imbalances under the imbalance cash-out mechanism of Transco's Tariff, which led to the accrual of the current under-recovery in the Cash-Out Resolution Mechanism, Transco is concurrently submitting revisions to the cash-out pricing provisions of Section 37 of the GT&amp;C of its Tariff. Transco anticipates that the future over- or under-recoveries in the Cash-Out Reconciliation Mechanism will be minimized.</p> <p>Initial Billing Period Under Proposed Mechanism</p> <p>Following a final Commission order approving the proposed Cash-Out Reconciliation Mechanism, Transco will calculate an initial surcharge using a Cash-Out Deferred Account balance that is equal to the under-recovery balance reported in Transco's immediately preceding annual cash-out activity report. The amount collected through the surcharge would be accounted for as a reduction to the Cash-Out Deferred Account. Any difference between the amount collected through the surcharge and the amount in the Cash-Out Deferred Account used in the design of the surcharge would be carried forward to the Cash-Out Deferred Account used in the calculation of the subsequent year's surcharge or refund rate.</p>	<p>Several interventions were filed. Several protests were filed.</p> <p>On 03/23/20, a Motion for Leave to Answer and Answer of Transco to protests and/or comments was filed.</p> <p>On 03/26/20 a Motion for Leave to Answer of Cabot Oil &amp; Gas to Transco's Answer was filed.</p> <p>On 03/30/20, an Order Accepting and Suspending Tariff Records, Subject to Refund, and Establishing Hearing Procedures was issued.</p> <p>On 03/31/20, a Request to Update Information was filed.</p>
RP20-620	Columbia Gas Transmission, LLC	3/11/2020	2/28/2020	Intervened on 03/11/2020	<p>Columbia is filing to establish Columbia's Electric Power Costs Adjustment ("EPCA") for the annual period beginning April 1, 2020.</p> <p>For the twelve-month period commencing April 1, 2020, the time-period utilized to determine the Current EPCA Rate, Columbia proposes to collect \$31,187,581 in annual electricity costs, compared to \$28,356,475 in annual electricity costs proposed to be collected for the twelve-month period commencing April 1, 2019, included in last year's EPCA filing. For the Unrecovered EPCA Surcharge, Columbia incurred an over-collection of \$616,486 in Electric Power Costs.</p> <p>The increase in Columbia's Electric Power Costs is primarily due to a full year of projected Mountaineer XPress Project throughput and the projected electric costs associated with the Ceredo Compressor Station.</p>	<p>Several interventions were filed.</p> <p>On 03/18/20, a letter order accepting Columbia's filing of tariff records to reflect the establishment of its electric power costs adjustment for the annual period beginning 04/01/2020 was issued.</p>
RP20-622	Columbia Gas Transmission, LLC	3/11/2020	2/28/2020	Intervened on 03/11/2020	<p>Columbia is filing to establish its Transportation Costs Rate Adjustment ("TCRA") to reflect estimated prospective Operational 858 Costs for the 12-month period commencing April 1, 2020, and unrecovered past Operational 858 Costs for the period January 1, 2019, through December 31, 2019.</p> <p>The estimated prospective Operational 858 Costs for the twelve-month period commencing April 1, 2020 are \$51,170,190, compared to \$51,764,543 of estimated prospective Operational 858 Costs, included in Columbia's 2019 Periodic TCRA Filing.</p> <p>The unrecovered past Operational 858 Costs, inclusive of interest, reflect a net under-recovery of \$2,623,242 which consists of an under-recovery of \$1,800,906 in demand costs and an under-recovery of \$822,336 in commodity costs. The unrecovered past Operational 858 Costs reflect the reconciliation of Account No. 858 costs actually incurred by Columbia with the TCRA amounts collected by Columbia during the period January 1, 2019, through December 31, 2019.</p> <p>Piedmont typically intervenes in TCO's TCRA filings. As such, we recommend intervening in this docket.</p>	<p>Several interventions were filed.</p> <p>A Limited protest of indicated shippers was filed.</p> <p>On 03/20/20, a Motion for Leave to Reply and Reply Comments of Columbia was filed.</p> <p>On 03/27/20, an Order on Tariff Records was filed.</p>

CP20-121	Transcontinental Gas Pipe Line Company, LLC	4/13/2020	3/23/2020	Intervened on 04/13/20	<p>Transco is filing to request authorization to abandon a portion of the firm transportation service that Transco provides to the following shippers under certain Rate Schedule FT service agreements:</p> <p>City of Danville, Virginia, Consolidated Edison Company of New York, Inc., Fort Hill Natural Gas Authority, Greer Commission of Public Works, KeySpan Gas East Corporation D/B/A National Grid, The Brooklyn Union Gas Company D/B/A National Grid NY</p> <p>The application states that the firm transportation service provided under the agreements was not subject to pregranted abandonment, and formal abandonment authorization is necessary in order to permit the shippers to reduce their contracted firm transportation capacity. Transco sought abandonment of the service pursuant to agreements between Transco and each of the shippers pursuant to which each shipper agreed to turn back to Transco a quantity of firm transportation capacity in the pipeline segment from Station 30 to Station 65 in exchange for a reservation rate discount.</p> <p>Each of the turn back agreements also provided Transco with an option to take back additional firm transportation capacity in the pipeline segment from Station 30 to Station 65. Transco notified the shippers that it intends to exercise the capacity take back option effective October 1 2020. The abandoned portion is equal to the shipper's Option Capacity:</p> <table><thead><tr><th>Shipper</th><th>Service Agreement</th><th>Option Capacity</th><th>(Dt/Day)</th></tr></thead><tbody><tr><td>Con Ed</td><td>1003683</td><td>34,260</td><td></td></tr><tr><td>Danville</td><td>1003165</td><td>1,725</td><td></td></tr><tr><td>Fort Hill</td><td>1003700</td><td>1,256</td><td></td></tr><tr><td>Greer</td><td>1003938</td><td>528</td><td></td></tr><tr><td>National Grid</td><td>1003687</td><td>25,087</td><td></td></tr><tr><td>National Grid NY</td><td>1003682</td><td>15,737</td><td></td></tr></tbody></table> <p>Although Piedmont is not one of the shippers who is turning back capacity, it may be helpful to know for informational purposes that the above named shippers received discounted rates in exchange for turning back a portion of their capacity. Please let us know if you would like to intervene. We will not intervene unless directed to do so.</p>	Shipper	Service Agreement	Option Capacity	(Dt/Day)	Con Ed	1003683	34,260		Danville	1003165	1,725		Fort Hill	1003700	1,256		Greer	1003938	528		National Grid	1003687	25,087		National Grid NY	1003682	15,737		Several interventions were filed.
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CP20-122	Transcontinental Gas Pipe Line Company, LLC	4/13/2020	3/23/2020	Intervened on 04/13/2020	<p>Similar to the filing above, Transco seeks authorization to abandon a portion of capacity subscribed to by South Jersey.</p> <p>Transco and South Jersey entered into an option Agreement for Turn Back Capacity on January 23, 2019, under which Transco received an irrevocable and exclusive option to take back 21,871 dt/day of firm transportation capacity under the Service Agreement in the segment of Transco's mainline from Station 30 to Station 65 in exchange for a reservation rate discount. On March 29, 2039, Transco provided notice to South Jersey of its intention to exercise the option to take back the 21,871 dt/day of capacity effective October 1, 2020.</p> <p>Although Piedmont is not one of the shippers who is turning back capacity, it may be helpful to know for informational purposes that the above named shippers received discounted rates in exchange for turning back a portion of their capacity. Please let us know if you would like to intervene. We will not intervene unless directed to do so.</p>	Several interventions were filed.																												
CP20-37	Texas Eastern Transmission, LP	1/12/2020	1/10/2020	Intervened on 2/6/2018	<p>TETCO is requesting authorization to replace four existing compressor units at the Lilly Compressor Station located in Cambria County, Pennsylvania, with two new, more efficient gas turbines to comply with future air emission reduction requirements in Pennsylvania.</p> <p>The two new compressor units proposed for this project will be installed with Solar's SoLoNOX dry low emissions technology for the control of NOX and will be equipped with oxidation catalysts for the control of carbon monoxide, volatile organic compounds, and organic hazardous air pollutants. TETCO states that following completion of the project, air emissions at the Lilly Compressor Station will be significantly lower than air emissions from the four existing compressor units.</p> <p>The estimated cost of the Project is \$106 million, which exceeds the prior notice cost limits applicable to TETCO's blanket certificate. TETCO is therefore requesting authorization to complete the activities contemplated herein pursuant to Section 7(c) of the NGA.</p> <p>Given the significant cost of the facilities being installed to comply with future requirements, and in light of TETCO's recent rate case settlement, we recommend intervening in this docket.</p>	<p>On 03/04/2020, TETCO submitted its response to the environmental data request.</p> <p>On 03/06/2020, TETCO submitted its response to the Accounting Data Request.</p> <p>On 03/11/2020, a Notice of Schedule for Environmental Review of the Lily Compressor Units Replacement Project.</p>																												
CP20-12	Columbia Gas Transmission, LLC	12/10/2019	11/6/2019	Intervened on 12/10/2019	<p>Columbia is filing an application to amend the existing authorizations associated with the Leach Xpress Project in order to modify the full-load operation of the Ceredo compressor station. Specifically, TCO seeks authorization to limit the use of the seven existing vintage reciprocating units at Ceredo CS to four units at a given time and to allow for the use of additional horsepower that is available from existing electric-driven compressor units located at Ceredo CS. In addition, TCO proposes to amend the noise level requirement for Ceredo CS and Crawford CS contained in Environmental Condition 31 of the LXP Certificate Order to provide that the noise condition set forth in the Environmental Impact Statement for LXP applies to operations at both stations.</p> <p>Although these amendments appear to be environmental-related and non-objectionable, since Piedmont intervened in Docket No. CP15-514, the original docket associated with TCO's Leach Xpress Project, Piedmont might also want to intervene in this docket as well. Please advise.</p>	<p>On 03/25/20, a letter order requesting Columbia to file a response to the environmental request within 5 days was filed.</p> <p>On 03/30/20, Columbia filed its response to the data request.</p>																												

RP20-168	Transcontinental Gas Pipe Line Company, LLC	11/12/2018	11/6/2019	Intervened on 11/18/2019	<p>Transco is filing to reflect a negotiated rate service agreement that it has entered into with Public Service Company of North Carolina, Inc. for service under Rate Schedule FT that contains non-conforming language, to be effective December 1, 2019. This agreement supersedes an agreement between Transco and PSCNC, which was filed in July 2018. This agreement reflects the replacement of an inactive delivery point (Dan River) with another delivery point (Dan River #2) and reflects the addition of a new delivery point (Battleground).</p> <p>This agreement contains non-conforming provisions, in Exhibit "B" and Exhibit "C," that are identical to those that were accepted by the Commission in the previous agreement. Exhibit "B" contains the same non-conforming footnote; however, the reference to the number 9 in the footnote text, referring to the number of delivery points, has been revised to the number 10.</p>	<p>On 11/22/2019, a letter order accepting Transco's filing of a revised tariff record to reflect a new Zone 5 to Zone 6 reservation recourse rate applicable to its Momentum Expansion Project was filed.</p>
RP19-987	East Tennessee Natural Gas, LLC	4/9/2019	3/28/2019	Intervened on 04/09/2019	<p>ETNG is filing its 2017-2018 Cashout Report which reflects a net loss from cashout activity of \$5,594,554. In accordance with its Rate Schedules LMS-MA, LMS-PA, and PAL, ETNG's 2016-2017 Cashout Report net loss balance of \$6,478,882 will be applied to the current year's net loss of \$5,594,554 to obtain a 2017-2018 Cashout Report net loss balance of \$12,073,436 to be carried forward to the next annual cashout report.</p>	<p>Several interventions were filed.</p>
RP19-1225	Transcontinental Gas Pipe Line Company, LLC	5/28/2019	5/16/2019	Intervened for PNG on 5/28/2019	<p>Transco is filing to submit the tariff records reflecting the language proposed in the pro forma tariff records, as directed by the Commission, that became effective subsequent to the January 2, 2018 filing in the Transco Priority of Service Docket (Docket No. RP18-314).</p>	<p>On 06/18/2019, a Letter order accepting Transcontinental Gas Pipe Line Company, LLC's 05/16/2019 filing of tariff records to comply with the Commission's September 7, 2018 order issued in Docket No. RP18-314-000 issued.</p>
CP19-494	Transcontinental Gas Pipe Line Company, LLC	9/4/2019	7/31/2019	Intervened On 08/27/2019	<p>Transco submitted an application for a certificate of public convenience and necessity authorizing Transco to construct and operate its Leidy South Project and abandon certain pipeline facilities. The Project is an expansion of Transco's existing system and an extension of Transco's system through a capacity lease with National Fuel Gas Supply Corporation.</p> <p>The application states that the project will enable Transco to provide 582,400 Dth/day of incremental firm transportation capacity from northern and western Pennsylvania to markets in Transco's Zone 5 and Zone 6. Transco states it has executed binding precedent agreements with the Project Shippers (Cabot Oil &amp; Gas Corporation, Seneca Resources Corporation, and UGI Utilities) for 100% of the incremental firm transportation service under the Project. Transco estimates that the Project will cost approximately \$531.12 million. Firm transportation service under the Project will be rendered by Transco pursuant to Rate Schedule FT of Transco's FERC Gas Tariff.</p>	<p>On 03/04/2020, a letter requesting Transco to file a response to data request within 5 days was issued.</p> <p>Several comments were filed.</p> <p>On 03/09/20, Transco submitted its response to the data request.</p> <p>On 03/27/20, Transco submitted its response to comments regarding the Leidy South Project.</p>
CP19-509	Texas Eastern Transmission, LP		9/4/2019	Intervened on 10/2/2019	<p>TETCO is filing an Abbreviated Application for a Certificate of Public Convenience and Necessity and Related Authorizations for its proposed Marshall County Mine Panel 19E Project. Texas Eastern proposes to excavate, elevate, and replace certain segments of four different pipelines and appurtenant facilities in Marshall County, West Virginia. The Project is designed to ensure the safe and efficient operation of Texas Eastern's existing pipeline facilities for the duration of the longwall mining activities planned by Marshall County Coal Company Inc., in the area beneath Texas Eastern's pipelines.</p> <p>Although TETCO does not propose to adjust its rates or tariff as part of this proceeding, it seeks rolled-in rate treatment on the basis that the project is designed to benefit the system as a whole rather than specific project shippers and enhance the reliability of service to existing shippers.</p> <p>We recommend intervening in this docket in light of TETCO's current rate case and its request for rolled-in rate treatment.</p>	<p>On 03/04/20, a letter requesting TETCO to file a response to the environmental information request within 5 days was filed.</p> <p>On 03/09/20, TETCO filed a response to the environmental information request.</p> <p>On 03/18/2020, TETCO submitted supplemental information.</p> <p>On 03/26/20, TETCO submitted supplemental information.</p> <p>On 03/30/20, a letter to US Fish &amp; Wildlife Service was filed.</p>
RP20-68	Texas Eastern Transmission, LP			Intervened on 10/28/2019	<p>TETCO is filing to reflect a negotiated rate transaction that it has entered into with Piedmont Natural Gas Company, Inc. for firm transportation service under Rate Schedule FT-1 (M1 Expansion Project) effective November 1, 2019 through March 31, 2022. The agreement will carry a reservation rate of \$6.292/Dth per month.</p> <p>Since this filing includes a Piedmont agreement, we recommend intervening.</p>	<p>Several other interventions were filed.</p> <p>On 11/1/19, a letter order accepting TETCO's filing of a revised tariff record to reflect a negotiated rate agreement with PNG for service under Rate Schedule FT-1.</p>

**Exhibit\_\_ (JCP-7)**



Piedmont Natural Gas  
Docket No. 2020-4-G  
Design Day Temperature

Exhibit (JCP - 7)

### **FY2020 DESIGN DAY**

### **Calculated Weighted Average Temperature - 1/21/1985 - Carolinas**

With 2019 Weights Across Weather Stations

<u>High Temp</u>	<u>Low Temp</u>	<u>Avg Temp **</u>	<u>Weather Station</u>	<u>Weighting *</u>	<u>Weighted Avg</u>
1	-12	-5.5	GEV	0.0047	-0.025963558
21	-8	6.5	GSO	0.2838	1.844930706
24	-5	9.5	CLT	0.3169	3.010321719
23	-8	7.5	HKY	0.0589	0.441750287
26	-4	11	GSP	0.1734	1.907168467
16	-2	7	ECG	0.0090	0.063032674
18	-1	8.5	POB	0.0530	0.450458912
18	-1	8.5	GWW	0.0787	0.669269252
27	5	16	ILM	0.0216	0.344824108
<b>Weighted Average Temperature</b>					<b>8.71</b>

\* Using 2020 calculated weightings that were updated on 05/1/2020.

\*\* Average of high and low temperatures

56.29